Before the

Federal Communications Commission

Washington, D.C. 20554

In the Matter of:
Eliminating Regulatory Waste: Streamlining The LPFM Service: Recognizing It As Part Of The NCE-FM Family

GN Docket No. 25-133

Comments of the LPFM Advocacy Group (LPFM-AG)

I. Introduction: A Smarter, Simpler Path Forward

The LPFM Advocacy Group (LPFM-AG) submits this final comment to highlight an area of regulatory inefficiency that is both low-hanging fruit and long overdue for reform: the **artificial separation between LPFM and NCE-FM** broadcast services.

We urge the Commission to **eliminate duplicative, unnecessary rules** that treat LPFM as an entirely separate service, when in reality, LPFM is effectively a **low-power subclass of NCE-FM** with identical ownership and mission-based requirements. The Commission can modernize and streamline its rules by:

- **Allowing LPFM stations to upgrade to any class of NCE-FM service**, contingent on contour spacing and a track record of rule compliance.
- **Permitting LPFM stations to be rebroadcast via live satellite or IP links to distant FM translators**, just like full-service NCE-FMs.
- **Allowing LPFM stations to use full-service FM broadcast transmitters**, once they have demonstrated long-term operational stability.

II. The Waste of Maintaining a Parallel LPFM Rulebook

The FCC currently maintains entirely separate technical, equipment, and program delivery rules for LPFM stations—despite the fact that LPFM stations:

- Must operate on a noncommercial basis;
- Are held to the same ownership and localism standards as NCE-FMs;
- Are required to comply with the Emergency Alert System (EAS); and
- Serve the same public interest function as full-service NCE broadcasters.

Yet LPFMs are boxed into a 100-watt limit, banned from IP-based signal distribution to distant FM translators, and required to use special (and often more expensive) LPFM-specific equipment. Maintaining this dual system results in:

- Redundant administrative oversight;
- Higher engineering and compliance costs for LPFMs;
- Technical inefficiency and limited service reach for the communities these stations serve.

This is regulatory waste—plain and simple. A more efficient model would be to treat LPFM as the entry point into the NCE-FM service, with a clear pathway to growth and parity.

III. Recommendation 1: Allow LPFMs to Upgrade to Full NCE-FM Status

LPFM stations that demonstrate at least five years of uninterrupted, violation-free service should be eligible to apply for an upgrade to any NCE-FM class for which they meet the contour spacing requirements.

This change would:

- Encourage long-term investment and excellence in LPFM operations;
- Reward compliant stations with earned regulatory trust;
- Support localism and nonprofit innovation in areas with available spectrum.

Upon upgrade, such stations would assume the full obligations of an NCE-FM licensee, including maintaining a public inspection file, participating in EAS origination if applicable, and adhering to all technical and public service rules of their new class.

This reform requires no new class of service and imposes no new regulatory burden—it merely offers an optional growth path for high-performing LPFMs and simplifies the overall regulatory framework.

IV. Recommendation 2: Allow Live Satellite or IP Delivery of LPFM Programming to Distant FM Translators

Currently, only full-service NCE-FMs may feed FM translators via IP stream or satellite link. LPFMs are denied this option, requiring off-air reception only. This rule is:

- Technologically outdated;
- Wasteful of spectrum and engineering resources;
- Unfairly discriminatory against LPFM licensees.

We propose a rule change to permit LPFM stations to deliver live programming to translators via satellite or IP—just as NCE-FMs do under §74.1231(b). This change would:

- Enable better service to rural areas and fill-in zones;
- Allow efficient use of infrastructure for small nonprofits;
- Require no changes to LPFM's core rules, only the translator input provision.

This simple fix promotes fairness, efficiency, and consistency in service delivery.

V. Recommendation 3: Allow Use of Any Compliant FM Broadcast Transmitter

LPFM stations are currently limited to using transmitters certified specifically for LPFM use, even if fully compliant Part 73 equipment is available at lower cost through donation or surplus.

We propose that LPFMs with five years of compliant operation be allowed to use any legally compliant FM transmitter authorized under Part 73, just as translators and NCE-FMs do. This would:

- Eliminate an artificial cost barrier;
- Improve equipment availability for small nonprofits;
- Reduce engineering waste and enhance reliability.

LPFMs have demonstrated technical reliability for over two decades. It is time to treat them accordingly.

VI. Conclusion: Reward Good Actors, Simplify the Rules

The LPFM service has matured. The Commission now has an opportunity to:

- Reward excellence by offering a path to growth;
- Eliminate duplicative and discriminatory rules;
- Support local communities through smart, streamlined regulation.

A more unified approach to NCE broadcasting—one that allows LPFM to evolve into full-service classes when appropriate—would reduce waste, promote fairness, and help America's smallest stations reach more people, more effectively.

Respectfully submitted,

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